

# The HazWaste Quarterly

Spring 2018



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### Aerosol container update

The Minnesota Pollution Control Agency (MPCA) has rescinded the January 1, 2018 sunset date for puncturing hazardous waste aerosols.

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## Manifest Shipments of Hazardous Waste

### What's a hazardous waste manifest?

A hazardous waste manifest is a multi-page shipping paper that must, with very few exceptions, accompany all shipments of hazardous waste. It provides a "cradle to grave" record of what happens to your waste after it leaves your site. This tracking of hazardous waste shipments helps to ensure that the waste is handled in a manner that protects human health and the environment.

### So, what are the exceptions?

The following wastes may be shipped on a bill of lading or another type of shipping paper. Keep these records.

- Feedstocks or byproducts.
- Electronics.
- Used oil and related wastes.
- Very Small Quantity Generator (VSQG) waste self-transported to a collection program.
- Universal wastes.

### Uniform hazardous waste manifest

You must use the Environmental Protection Agency's (EPA) uniform hazardous waste manifest for non-exempt hazardous wastes. Blank manifests can be obtained from an EPA approved printer; however most hazardous waste transporters will provide one when you contract with them for services.

### How do I fill out a manifest?

Manifests are often prepared by the transporter. However, it is your responsibility to ensure that everything

is accurately completed. Check it over carefully. Is your company name and HW ID number correct? Does the DOT shipping name reflect the waste being shipped? Are the hazardous waste codes correct?

### What happens next?

After you and the transporter both sign and date the manifest, the transporter will leave the last page with you and take the other pages with the shipment. This page is sometimes called the initial or two-signature copy. Keep it with your records. The transporter then delivers your waste to the hazardous waste

facility designated on the manifest.

### How do I know my waste was properly delivered?

When your waste reaches the facility, a representative will sign and date the manifest. They keep a copy for their records, give the transporter a copy and return one to you within 30 days. This copy is known as the final or 3-signature copy.

If you don't receive this copy within 35 days, contact both your transporter and facility to check on your shipment. If after 45 days you still haven't received a copy from the facility, submit an exception report to the Minnesota Pollution Control Agency (MPCA) describing the situation and the efforts you have taken to locate the shipment. Call us if you need any assistance with this process.



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## So, You're Being Inspected

### All Ramsey County hazardous waste generators are inspected.

Inspections are unannounced and conducted for many reasons, primarily to review your hazardous waste management. While inspections are regulatory in nature, your inspector wants to work with you to provide any education and technical assistance you need to better understand the hazardous waste rules.

Types of inspections include:

#### Initial inspection

- Your company's first hazardous waste inspection.
- Typically, occurs when the county licenses your site for hazardous waste generation.

#### Routine inspection

- Based on your company's industry risk category and last inspection date.
- Industries that generate wastes that have a greater environmental risk, if not properly managed, are inspected more frequently.

#### Follow-up inspection

- Occurs when a significant violation is noted or when an inspection was incomplete.
- To avoid an incomplete inspection, have a knowledgeable back-up or an alternate contact person, in case you are unavailable.

#### Complaint inspection

- Done because of a complaint about your business.
- The county's approach is neutral, discussing the complaint with you to understand and resolve the situation.

#### Closure inspection

- Happens when your company is leaving a site.
- A closure inspection documents the condition of the site, prior to you leaving it.
- All hazardous products and wastes must be removed before you leave; you cannot take your hazardous waste with you to a new location.

## Manifesting Shipments of Hazardous Waste

Continued from page 1

### How long do I need to keep manifest records?

Manifests, either electronic or hard-copy, must be on-site and readily available for three years from the date of shipment. We recommend that you keep them forever, filed by shipping date; if there are future questions about your waste, you will have that information.

## Hazardous Waste Program Updates

### Annual reporting

Thank you for working with us during our transition to online annual reporting! We wanted to provide you with a more streamlined way to complete the task while improving our ability to manage the data. Out of 1680 businesses receiving annual reports, 1478 received theirs electronically through access to the online web portal. Many businesses reported that online data entry was easy, simple, and straightforward. We heard comments like "easy to use", "much quicker to fill out", "very simple to make changes". Please let us know if you have any further feedback.

### Electronic communications

We are continuing to move in this direction. We will be mailing out your invoice. After payment is received, we will email your 2018 – 2019 hazardous waste generator license certificate and a copy of your 2017 annual report. Unfortunately, we can't accept electronic payments or credit cards at this time but hope to offer these options next year.

### Invoicing changes

To streamline our billing process, we are changing how we calculate your hazardous waste fees. This change improves our efficiency in assuring you will receive your hazardous waste license certificate ahead of May 1, 2018. Most businesses will receive their invoice in early March; **please note the fee submittal address has changed!**

For this license year, we'll be using the volumes you reported on your 2016 annual report. Beyond this year, we will be calculating your license fee based on your previous year's annual report volumes. If you have significant waste volume fluctuations year to year, a rolling year average can be used to calculate your license fee. If you had a significant, permanent reduction in hazardous waste generation, this will factor into the calculation. Contact your inspector with any questions.

## Switch Out Your Solvent Based Parts Washer and Save!

### A 25% discount for eligible businesses.

The Minnesota Pollution Control Agency (MPCA) has developed a pilot project with Safety-Kleen that gives a 25% discount to small businesses who switch from a solvent-based to an aqueous-based parts washer.

### Why?

Federal Clean Air Act sets air quality standards for common air pollutants found throughout the United States. One of these is ground-level ozone, whose limit was lowered in 2015. While Minnesota does not violate the new standard, some parts of the state are very close. If we end up exceeding the limit, it could mean new, more expensive regulations for Minnesota businesses.

One source of ground-level ozone are volatile organic compounds (VOCs). A very cost-effective way to reduce VOCs is to switch from an organic solvent-based to an



aqueous-based parts washer. To get the most bang for its buck, the MPCA partnered with Safety-Kleen. Safety-Kleen has 50 years of experience manufacturing and servicing aqueous parts washers, giving them a unique ability to reach a wide set of small businesses that may be able to take advantage of this opportunity.

### Who?

The discount can only be used for product purchases that involve switching to aqueous-based parts washers. All interested small businesses, defined as having 100 or less employees, are encouraged to take advantage of this right away. The limited funding will only be available for a short time.

### To participate

Contact Eric David, MPCA, at [eric.david@state.mn.us](mailto:eric.david@state.mn.us) or 651-757-2218.

## Questions, Questions (and some answers!)

### What are some of the common violations inspectors see and how can our business stay in compliance?

Some common compliance problems we see are open, unlabeled containers of waste. Whether it is used oil, used oil sorbents, used oil filters, or containers of used solvents, they are all required to be stored in a closed container and labeled with a descriptive name that identifies the contents.

A closed container means that the covers are latched or the bungs are in place and funnels are closed. Of course, the containers will be open when you are adding or removing the waste (i.e. pumping it out), but before you walk away the container must be closed.

If necessary, you can drain your used oil filters overnight in an open container tray. When you arrive the next day, these filters must be placed into a container and the container closed.

You might discover that the container that you are using isn't easy to use or close. Check with your vendor for containers that have a levered lid or funnels that have a latching device. These types of container lids make it simple to open and close your container. Making it easy and practical for your employees to use will increase the likelihood of them maintaining proper storage conditions.



Ensure that your staff has been trained and understands what it means to have a closed, labeled container. Ramsey County offers free hazardous waste training to all of our licensed businesses, including customized training specific to your site. There are also fact sheets

available from the Minnesota Pollution Control Agency (MPCA) that cover all of these requirements. After training your staff, it may take a little time for them to adapt to these changes. You may need to follow-up with them to see if they have any questions.

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